

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

This document relates to: All Cases



MASTER DOCKET

18-md-2865 (LAK)

**JOINT STIPULATION AND [PROPOSED] ORDER  
EXTENDING TIME TO FILE RULE 56.1 STATEMENTS**

WHEREAS the Court's Pretrial Order No. 29 (ECF No. 675) (the "Pretrial Order") requires the parties to file a joint Rule 56.1 statement on or before March 31, 2022, and, to the extent the parties disagree as to the contents of the joint Rule 56.1 statement, "supplemental Rule 56.1 statements as necessary" also on March 31, 2022 (Pretrial Order ¶ 2.5);

WHEREAS the parties are cooperating to draft a joint Rule 56.1 statement and believe those efforts would benefit from a one-week extension of the deadline to April 8, 2022;

WHEREAS the contents of any supplemental Rule 56.1 statement cannot be known until the parties have finalized the joint Rule 56.1 statement;

WHEREAS extending the deadline to submit the supplemental Rule 56.1 statements would permit the parties to focus their present efforts on the contents of the joint statement; and

WHEREAS no party will be prejudiced by receiving any supplemental Rule 56.1 statement at the same time the party receives an opposing party's motion for summary judgment,

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that the current March 31, 2022 deadlines for the parties to file a joint Rule 56.1

statement and any supplemental Rule 56.1 statements shall be extended to April 8, 2022, and April 15, 2022, respectively.

IT IS HEREBY FURTHER STIPULATED AND AGREED by and between the undersigned counsel for the parties that Local Rule 56.1 governs the parties' responses to any supplemental Rule 56.1 statements. The parties may submit rebuttals, in the form specified by Local Rule 56.1, to any separate Rule 56.1 statement concurrently with their opposition briefs.

This is the parties' first request to modify the Pretrial Order. No other deadlines established in the Pretrial Order are affected.

Dated: New York, New York  
March 23, 2022

By: /s/ Sharon L. McCarthy  
Sharon L. McCarthy  
KOSTELANETZ & FINK LLP  
7 World Trade Center  
New York, NY 10007  
Telephone: (212) 808-8100  
smccarthy@kflaw.com

By: /s/ Alan E. Schoenfeld  
(e-signed with consent)  
Alan E. Schoenfeld  
WILMER CUTLER PICKERING HALE AND  
DORR LLP  
7 World Trade Center  
New York, NY 10007  
Telephone: (212) 230-8800  
alan.schoenfeld@wilmerhale.com

*Lead Counsel for Defendants*

By: /s/ Marc A. Weinstein  
(e-signed with consent)  
Marc A. Weinstein  
HUGHES HUBBARD & REED LLP  
One Battery Park Plaza  
New York, NY 10004  
Telephone: (212) 837-6000  
Fax: (212) 422-4726  
marc.weinstein@hugheshubbard.com

*Counsel for Plaintiff Skatteforvaltningen  
(Customs and Tax Administration of the  
Kingdom of Denmark)*

SO ORDERED  
  
LEWIS A. KAPLAN, USDI